

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO: 04-10246

LORENZO GUARINO,)
Plaintiff)
)
v.)
)
R.W. GRANGER AND SONS, INC. &)
SCAVONE C&M CONSTRUCTION CO., INC.,)
Defendants)
)

**THE DEFENDANT'S, SCAVONE C&M CONSTRUCTION CO., INC.,
RULE 26(a)(1) DISCLOSURE**

The Defendant, Scavone C&M Construction Co., Inc., hereby makes this its automatic disclosure through undersigned counsel, pursuant to and in accordance with Rule 26 of the Federal Rules of Civil Procedure and Local Rule 26.2(A), reserving the right to supplement and amend, as follows:

I. Rule 26(a)(1)(A) – Individuals Likely to Have Knowledge of Discoverable Facts

The Defendant anticipates the following individuals may have pertinent knowledge with respect to the claims and defenses in this action:

1. Dominic Scavone, 3300 Alternate 19, Lot 118, Dunedin FL, 34684 ;
2. Lorenzo Guarino, 80 Dewey Avenue, Pawtucket, RI 02861;
3. Ernest O'Brien, 20 Woodland Drive, Westminster, MA 01473;
4. Alvin DuPont, 754 Sodom Road, Westport, MA 02790;
5. Robert LaPierre, 41 Boston Turnpike, Shrewsbury, MA 01545;
6. Steven Campbell, 41 Boston Turnpike, Shrewsbury, MA 01545;

7. Luann Scott, 41 Boston Turnpike, Shrewsbury, MA 01545;
8. Melissa Hicks, 5 Eastern Avenue, East Providence, RI 02914;
9. Ken Gelinas, 5 Eastern Avenue, East Providence, RI 02914.
10. Designated Representative of BOC Gas;
11. Designated Representative of the Town of Marion.

The Defendant reserves the right to further supplement and amend this list.

II. Rule 26(a)(1)(B) – Documents and Things in the Possession of Counsel of Party

The Defendant states that it has no documents in its possession in this matter which have not been provided by other parties to this litigation.

III. Rule 26(a)(1)(D) – Insurance

The Defendant is insured under a policy of insurance with Zurich Insurance Company with a policy period of January 30, 2002 through January 30, 2003 with a liability limit of \$1 million.

Respectfully submitted,
The Defendant,
Scavone C&M Construction Co., Inc.,
By its attorneys,



Mark B. Lavoie, BBO# 553204
Christopher W. Costello BBO# 645936
McDonough, Hacking & Lavoie, LLC
6 Beacon Street, Suite 815
Boston, MA 02108
(617) 367-0808

Dated:

April 26, 2006

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing pleading on all parties by electronic service, to all counsel of record.
Signed under the pains and penalties of perjury.

DATED: *April 28, 2006*